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April 3, 2014

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons, LLC – Old Rainier Brewery Exterior Paint Abatement
Phase I Individual Phased Work Plan (IPWP)

Dear Ms. Mullin:

EPA approved the Rainier Commons application for risk based approval of its Work Plan for Exterior Paint Removal dated March 25 2013 and revised pursuant to EPA request July 25 2013. EPA's conditional approval is dated December 18, 2013. Rainier Commons is submitting this Individual Phased Work Plan for the Phase I Work, pursuant to the Work Plan, EPA's December 18, 2013 approval and subsequent in-person meeting and phone conference with Rainier Commons' representatives. This IPWP is a supplement to the Work Plan and incorporates the Work Plan by reference as if set forth here again, in full.

Phase I of the Work includes the removal of exterior paint from the west elevation of building 10, the west elevation of building 11 and all four elevations (sides) of building 13 via fully contained blasting with sand, walnut shells or soda as a blast medium. The remediation areas on building 10 and 11 are primarily brick substrate and building 13 is largely brick with a concrete apron or area of concrete at the ground floor level. Each building also includes small areas of metal substrate such as window frames and parapet flashing, which will need to be remediated via chemical stripping. Window frames will be chemically stripped within the containment. Parapet cap and wall flashings will be chemically stripped outside of the negative air containment structure as this process can be carried out in open air without creating any dust, airborne or waterborne waste. For chemical stripping, the dried paint on metal is coated with a viscous chemical stripper and then covered with impermeable sheeting, allowing the chemical stripper to convert the dried paint into a gel type consistency, which is then removed with the sheeting and wiped clean from the metal surface. All resultant waste materials will then be wrapped together stored in containers and disposed of pursuant to the applicable PCB waste disposal regulations.

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RCLLC 0011258

Enclosed with this letter are the following components of the IPWP for the Phase I Work:

1. NVL Condition 6 Catch Basin Sampling Plan for Phase I IPWP;
2. CGI Rainier Commons Site Specific Exterior Paint Abatement Safety Plan;
3. CGI Spill Control Plan;
4. CGI 40 hour Hazwoper training cards – to be supplemented when final crew selected and work allocated;
5. CGI General Health and Safety Plan;
6. CGI Sketch of Containment Enclosure with Secondary Containment Elements;
7. CGI Rainier Commons Supplemental #001 to Work Plan;
8. NVL Addendum 1 Condition 6 Catch Basin Sampling Plan for Phase I IPWP;
9. NVL Storm & Sanitary Inlets Protection Plan;
10. NVL Buildings 10, 11, 13 IPWP Specific Storm & Sanitary Inlets Protection Plan;
11. NVL Condition 8 Sampling Plan for Verification of Concrete Substrate Once Visual Standard Met;
12. NVL Visual Inspection Plan to Evaluate Work Performance; and
13. NVL Example of Method to Randomly Select Two Percent Surface Area to Test

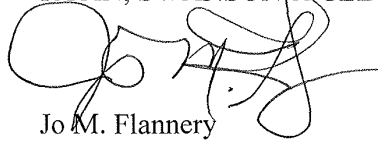
Several of these documents have been provided to EPA in draft form or as advance copies for review and early feedback. All of these documents were requested or required by EPA either in the formal December 18, 2013 approval of the Work Plan or in subsequent meetings or conferences. We understand that EPA will review the IPWP and provide approval within 30 days of this submittal. We further understand that Rainier Commons will be authorized to proceed and initiate the Work within 30 days of the approval of this IPWP. Therefore, it is our understanding that Rainier Commons could engage its contractor to commence the work on or about June 2, 2014. Any advanced input regarding timing to the date of approval that might vary from this projection would be appreciated as the contractor has been more than patient in extending the scheduling of this Work.

We look forward to EPA's approval of this Phase I IPWP. If you have questions please contact our office or Rainier Common's Project Manager.

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Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC

A handwritten signature in black ink, appearing to read 'Jo M. Flannery', with a large, stylized initial 'J'.

Jo M. Flannery
Attorney Of Counsel

Enclosures

cc: Client

Alex Fidis, EPA Regional Counsel (via electronic copy with enclosures)

Mark Marcell, CGI (via electronic copy with enclosures)

Dave Leonard, NVL (via electronic copy with enclosures)